IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

UNDER SEAL

GREGORY CASTILLO-ROSARIO,

10,

Case No. 1:24-mj-411

Defendant.

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Daniel McCoy, being duly sworn, depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

- 1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging that, from at least in or around April 2022 until at least February 2024, within the Eastern District of Virginia and elsewhere, the defendant, GREGORY CASTILLO-ROSARIO ("CASTILLO-ROSARIO"), did knowingly and intentionally combine, conspire, confederate, and agree with others, known and unknown, to create a counterfeit substance and distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(a)(2), 841(b)(1)(A) and 846.
- 2. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since January 2021. I am currently assigned to the Washington Field Office, Northern Virginia Resident Agency. I am on a squad that investigates transnational organized crime, including darknet related narcotics trafficking, and have been assigned to this squad since

June 2021. Prior to being hired as a Special Agent with the FBI, I was a corporal with the Collier County Sheriff's Office in Naples, Florida, and was so employed from April 2015 until January 2021. I have received formal training in the investigation of drug and violent crimes, including specialized training in evidence collection. I have experience investigating various types of crime, and I have investigated or assisted in the investigation of numerous cases involving violent criminal activity, narcotics, darknet drug trafficking, and crimes against persons and property. I have been a sworn law enforcement officer during all times herein.

- 3. During my time in law enforcement, I have participated in the application for and execution of numerous arrest and search warrants in investigations of narcotics offenses, resulting in the prosecution and conviction of numerous individuals and the seizure of illegal drugs, weapons, stolen property, and other evidence of criminal activity. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by the traffickers and abusers of dangerous controlled substances.
- 4. Based on my training and experience relating to the investigations of drug traffickers, and, based upon interviews that I have conducted with other officers, defendants, informants, witnesses, and participants in drug trafficking activity, I am familiar with the ways that drug traffickers conduct their business. My familiarity includes the various means and methods by which drug traffickers import and distribute drugs, their use of cellular telephones, their use of vehicles, their use of storage facilities and/or third-party residences to house illicit items, tablet press machines, or proceeds from illicit activity, their use of clandestine locations to manufacture illicit tablets, their use of numerical codes and code words to conduct transactions, and their means to conceal, convert, transmit, and transport their drug proceeds, including, but not limited to, the use of couriers and vehicles to transport currency and proceeds, the use of third parties to purchase

or hold title to assets, the use of cryptocurrency to conceal origination of illicit payment, and the utilization of the darknet to hinder law enforcement detection. As part of my training and experience, I have also investigated and arrested those who have been suspected of illegally manufacturing counterfeit tablets by utilizing tablet press machines and binding material.

- 5. Based on my training and experience, I am also familiar with the ways that drug traffickers utilize tablet press machines to manufacture and produce illicit controlled substances in a convenient, tablet form. I know, through training and experience, that manufacturing counterfeit tablets can be profitable for drug dealers. From past training and experience in recent tablet press machine cases, I have learned it is common for operators of clandestine tablet press operations to enlist the assistance of third persons or third-party addresses to purchase and/or receive machines, tablet components, and related products to avoid law enforcement scrutiny. Clandestine tablet press machines and binding material are often shipped to one location then relocated to a second location to avoid detection by law enforcement. Often, a clandestine tablet press operation may span across several different locations.
- 6. The statements in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all my knowledge about this matter.

PROBABLE CAUSE

7. The United States including the FBI, the Drug Enforcement Administration ("DEA"), the U.S. Postal Inspection Service ("USPIS"), and the Food and Drug Administration – Office of Criminal Investigations ("FDA-OCI") (collectively, the "LAW ENFORCEMENT AGENCIES"), have been investigating a criminal enterprise utilizing the darknet to facilitate the

sale of controlled substances, primarily counterfeit Adderall¹ tablets made with methamphetamine.² Since October 2022, law enforcement conducted over twenty (20) controlled purchases from the enterprise via the darknet on various darknet marketplaces ("DM"s).

I. Background on DMs

- 8. A DM is a hidden commercial website that operates on a portion of the Internet that is often referred to as the TOR network, darkweb, or darknet. A DM operates as a black market, known to sell or broker transactions involving legal productions as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, child pornography, murder-for-hire, and other illicit goods.
- 9. Buyers typically purchase narcotics through DMs from "vendors" who accept digital currency, such as Bitcoin,³ for payment. "Vendors" are the darknet's sellers of goods and services, often of an illicit nature, and do so through the creation and operation of "vendor accounts" on DMs. Customers, meanwhile, operate "customer accounts." Vendor and customer accounts are not identified by numbers, but rather monikers or "handles," much like the username one would use on a Clearnet (i.e., publicly available and accessible Internet) website. If a moniker on a particular marketplace has not already been registered by another user, vendors and customers can use the moniker across marketplaces.

¹ Adderall is a brand name for a central nervous stimulant, consisting of amphetamine and dextroamphetamine, and manufactured by Teva Pharmaceuticals. Adderall is a Schedule II controlled substance, used to treat attention deficit hyperactivity disorder and narcolepsy, and only available by prescription. A popular generic form of rapid-release Adderall is an oval, orange tablet with "b974" debossed on one side and "30" on the other.

² Laboratory results for these tablets have found them to contain both "methamphetamine" and "methamphetamine (calc. as hydrochloride)."

³ Bitcoin is a type of digital cryptocurrency. Functionally, it serves the same purpose as United States dollars, except that it is not tied to a central bank and is not regulated by a government body such as a treasury. Bitcoin transactions take place entirely online and offer a degree of anonymity to users. Bitcoin transactions are securely recorded on a public ledger called a "blockchain." Based on my training and experience, individuals who are involved in criminal activity on the darknet often purchase items in Bitcoin to conceal the true nature of the funds from law enforcement.

10. I know, through my training and experience, that darknet drug vendors will often operate various darknet drug vendor accounts on various DMs. Some of these accounts have identical monikers and identical Pretty Good Privacy ("PGP") keys, while some accounts use different monikers and different PGP⁴ keys. When a darknet drug vendor has an identical moniker and PGP key across various DMs, it allows customers to trust that the darknet drug vendor is the same entity across various platforms. Conversely, when a darknet drug vendor uses different darknet drug vendor monikers and different PGP keys, it may disassociate a name with a particular darknet drug vendor. This is often done in attempts to hinder law enforcement from linking multiple darknet drug vendor accounts to the same enterprise. For example, if one darknet drug vendor moniker was dismantled by law enforcement, the defendants could still operate under another.

II. Overview of Investigation

11. Throughout the investigation, law enforcement identified at least three darknet drug vendors operating under this enterprise: NuveoDeluxe, AllStateRx, and Mrjohnson. These vendors took orders for counterfeit Adderall over the respective DMs they operated on. The individuals operating these vendor pages would create the counterfeit Adderall pills using methamphetamine as the active ingredient. They took cryptocurrency as payment for the drug orders, then mailed the drugs through the United States Postal Service ("USPS") to addresses provided by the customer. From at least April 2022 until at least February 2024, the three darknet

⁴ PGP is used on DMs to encrypt communications between vendors and customers. When a customer orders from, or contacts, a darknet drug vendor on a DM, that information may be stored on the DM's database. Given concerns that the DM server may be hacked or seized by law enforcement, vendors and customers often communicate via PGP encrypted means to address this security problem. A vendor has both a PGP private key and a public key. A customer can use the vendor's public key to encrypt a message. The vendor then uses the private key to decrypt the message. Vendors keep their private key secure but not their public key, which they generally put on their profile. This is done so customers may use a vendor's PGP public key to encrypt data sent to the vendor, such as the customer's name and address. Only the corresponding PGP private key, held by the vendor, can decrypt the data.

drug vendors have distributed more than approximately 13,000 suspected drug orders by mail from at least four (4) different United States federal districts, including the District of Massachusetts, the Middle District of Florida, the District of New Jersey, and the Eastern District of New York. These orders were shipped to destinations throughout the United States of America, including to the Eastern District of Virginia, and suspected to have contained more than 250 kilograms of a mixture and substance containing methamphetamine.

- 12. Thus far, three individuals have been charged in the Eastern District of Virginia relating to their involvement in the conspiracy: Joshua Vasquez ("JOSHUA"), Joseph Vasquez ("JOSEPH"), and Rafael Roman ("ROMAN"). JOSEPH was the creator and main operator of the NuveoDeluxe page, JOSHUA was the creator and main operator of the AllStateRx page, and ROMAN was a co-conspirator who assisted JOSHUA and JOSEPH in the manufacturing and distribution of the counterfeit pills. All three individuals pled guilty to conspiracy to create a counterfeit substance and distribute 500 grams or more of methamphetamine. *See* 1:24-cr-76, ECF No. 59; 1:24-cr-83, ECF No. 63; 1:24-cr-114, ECF No. 65.
- 13. As detailed below, further investigation into this enterprise has revealed that CASTILLO-ROSARIO was the creator and primary operator of the Mrjohnson vendor page. CASTILLO-ROSARIO, in addition to selling counterfeit Adderall pills made with methamphetamine over the darknet, would distribute these pills through street deals as well.

III. Identification of CASTILLO-ROSARIO and Controlled Purchase

14. In the spring of 2022, law enforcement in Boston, Massachusetts learned from a

confidential source ("CS-1")⁵ that an individual he⁶ knew as "Greg" was selling counterfeit Adderall pills. "Greg" communicated with CS-1 through telephone number XXX-XXX-6105 ("GREG TELEPHONE NUMBER"). GREG TELEPHONE NUMBER was registered to a different name and an address in Fitchburg, Massachusetts. A check with the Massachusetts Registry of Motor Vehicles ("RMV") showed several cars registered to the address, including one registered to CASTILLO-ROSARIO. Law enforcement compared CASTILLO-ROSARIO's RMV photo to a photo of "Greg" supplied by CS-1. The RMV photo of CASTILLO-ROSARIO matched the photo provided by CS-1.

15. CS-1 and CASTILLO-ROSARIO would also communicate through the encrypted application PRIVNOTE.⁷ In the summer of 2022, CASTILLO-ROSARIO used PRIVNOTE to send a message to CS-1, claiming to have counterfeit Adderall for sale at 65 cents per tablet, as shown below:

They on deck got them at .65 rn the football shape the b974 but you know depending on the amount I'll hook you up

16. CS-1 stated he knew an individual who may be interested in buying 10,000

⁵ In or about the summer 2021, CS-1 was charged in the United States District Court for the District of Massachusetts with violating 21 U.S.C. §§ 841(a)(1) and 846 (Conspiracy to Distribute Methamphetamine). He is currently assisting law enforcement in the hopes of a favorable resolution of those charges. CS-1 also has a prior conviction for Intimidation of Witness, Juror, or Police Officer. CS-1 has provided information to law enforcement that has proven reliable through independent corroboration. That information has led to multiple seizures of illicit narcotics and arrests. There is no indication or information available to investigators that CS-1 is providing false information regarding the investigation.

⁶ Any mentions of CS-1 are referred to using the male pronouns, regardless of gender.

⁷ I know PRIVNOTE to be an application that destroyed communications after the intended recipient reads them. To preserve PRIVNOTE messages for evidentiary purposes, CS-1 attempted to take screenshots prior to messages' destruction. However, CS-1 was unsuccessful in capturing every message between he and CASTILLO-ROSARIO.

counterfeit Adderall tablets from CASTILLO-ROSARIO. CASTILLO-ROSARIO agreed to sell 10,000 for \$6,500—65 cents a tablet. In August 2022, CASTILLO-ROSARIO indicated that he was ready to meet the individual for the transaction, and provided a Wal-Mart parking lot in Burlington, Massachusetts to conduct the transaction.

17. To successfully mediate the transaction, CS-1 asked CASTILLO-ROSARIO if CS-1 could supply CASTILLO-ROSARIO's telephone number to the buyer. CASTILLO-ROSARIO declined, and instead asked for the buyer's vehicle information, as shown below:

Note contents

This note was destroyed. If you need to keep it, copy it before closing this window.

Nah just tell her to park up and give me her car info I'll find her

18. At CASTILLO-ROSARIO's request, CS-1 provided the vehicle information for the buyer. Several minutes later, CASTILLO-ROSARIO located and entered the buyer's vehicle with a black shopping bag and sat in the passenger seat. CASTILLO-ROSARIO then removed a USPS box and presented it to the buyer who, unbeknownst to CASTILLO-ROSARIO, was a law enforcement undercover employee ("UC"). After the UC asked if CASTILLO-ROSARIO could show the contents of the package, CASTILLO-ROSARIO opened the box revealing thousands of oval, orange tablets debossed with "b974" on one side and "30" on the other. The tablets were later laboratory confirmed to contain a detectable amount of methamphetamine with a net weight of over 4 kilograms. The UC then provided CASTILLO-ROSARIO with \$6,500 in cash, which

CASTILLO-ROSARIO concealed in his waistband. CASTILLO-ROSARIO then departed. A

photograph of CASTILLO-ROSARIO captured by a covert camera during the transaction as well as the tablets sold to the UC are shown below:





19. The investigation into CASTILLO-ROSARIO continued through 2023. At some point, CASTILLO-ROSARIO informed CS-1 that he also sold pills on the darknet. CASTILLO-ROSARIO would take the orders, then receive cryptocurrency online as payment. CASTILLO-ROSARIO also told CS-1 that CASTILLO-ROSARIO had recently started working with a new partner to continue his darknet activities.

IV. <u>Investigation into Mrjohnson Vendor Page</u>

20. During this same time frame, law enforcement was separately investigating the Mrjohnson vendor page. The investigation into Mrjohnson went as far back as October 2022, when an online covert employee ("OCE") made a purchase of counterfeit Adderall from MrJohnson on the Tor2Door DM. That order was shipped to an address in Prince William County, Virginia, within the Eastern District of Virginia. Laboratory analysis confirmed the pills contained

a detectable amount of methamphetamine with a net weight of 40.43 grams.

- 21. The investigation into Mrjohnson continued. Crucially, on or about September 21, 2023, a law enforcement OCE accessed the Bohemia DM and ordered 100 tablets advertised as Adderall from Mrjohnson. The OCE provided an address within the District of New Jersey where Mrjohnson could send the order.
- 22. USPS tracking data around this time showed undercover parcels with Mrjohnson were shipping from Brooklyn, New York. Throughout September 2023, law enforcement spoke with employees at post offices in Brooklyn, New York, and inquired about bulk USPS Priority Mail Envelope deposits that would be consistent with those deposited by Mrjohnson. Employees at one post office specifically reported a male making frequent deposits of these bulk items.
- 23. On or about September 27, 2023, law enforcement conducted surveillance of that post office in the Eastern District of New York. During surveillance, law enforcement observed a male, later identified as ROMAN, enter that post office with two large shopping bags. Once inside the post office, employees, recognizing ROMAN as the individual they informed law enforcement about who consistently deposited parcels at that post office, witnessed ROMAN deposit numerous parcels. After ROMAN departed, employees set the parcels aside, and turned them over to law enforcement. Law enforcement executed search⁸ warrants on two of those parcels. Each contained numerous orange, oval tablets debossed with "b974" on one side and "30" on the other, similar to those sold by CASTILLO-ROSARIO to the UC in August 2022. Laboratory analysis confirmed that these tablets contained a detectable amount of methamphetamine, with a total net weight of 204.24 grams.
 - 24. Throughout the fall of 2023, law enforcement witnessed ROMAN deposit other

⁸ The searches were authorized on October 31, 2023 by the Honorable James B. Clark III, United States Magistrate Judge for the District of New Jersey. *See* 23-mj-12241-jbc and 23-mj-12242-jbc.

packages of counterfeit Adderall pills into the mail stream that were associated with the Mrjohnson vendor page. Law enforcement conducted surveillance of ROMAN's residence and noticed that JOSHUA would make frequent trips there, dropping off packages that resembled drug parcels seized or surveilled during the investigation into NuveoDeluxe and AllStateRx.

- 25. Also during this time, law enforcement discovered that an IP address associated with ROMAN's residence was ordering shipments of numerous USPS mailers. These mailers were sent both to ROMAN's residence and a salon in Brooklyn, New York ("BROOKLYN SALON"). The BROOKLYN SALON was a property owned by a family member of ROMAN's. ROMAN also listed the BROOKLYN SALON address on his New York driver's license.
- 26. Further investigation into the BROOKLYN SALON revealed that the property was likely tied to both ROMAN and JOSHUA's drug activities. For instance, in January 2024, law enforcement observed JOSHUA retrieve a package from a separate Brooklyn residence, place it in his vehicle, and drive it to the BROOKLYN SALON. In response to a subpoena, law enforcement found that the package JOSHUA transported to the BROOKLYN SALON had been shipped from a prominent pill and tablet press distributor ("TABLET COMPANY 1"). Law enforcement discovered that TABLET COMPANY 1 had also shipped a package, addressed to ROMAN, to the BROOKLYN SALON.
- 27. Based on this information and other ties, law enforcement secured a warrant to search the BROOKLYN SALON in February 2024.⁹ In the basement of the BROOKLYN SALON, law enforcement found a makeshift laboratory used to manufacture counterfeit Adderall. Numerous items were located, including but not limited to, large black containers with yellow lids that were empty but contained powdered orange residue, numerous tin-foil pans with orange

⁹ The Honorable Vera M. Scanlon, Untied States Magistrate Judge for the Eastern District of New York issued the warrant on February 15, 2024. *See* 24-mj-140-vms.

residue, professional-grade respirator masks, multiple high-speed grinding machines, two tablet press machines, and nearly 40,000 counterfeit Adderall tablets. The tablets were laboratory-tested and confirmed to contain methamphetamine, with a net weight of over 16 kilograms. The tablets were visually similar to the ones CASTILLO-ROSARIO distributed to the UC in August 2022 and the ones mailed by ROMAN on behalf of Mrjohnson. Photographs of some of these items are below:







V. <u>Information Provided by Other Confidential Sources</u>

- 28. The investigation remains active and ongoing. Numerous interviews have been conducted by law enforcement throughout the investigation. Several of those interviews have been with individuals with significant information relevant to the investigation.
- 29. For instance, law enforcement has received information from a cooperator ("CS-2")¹⁰ who admitted to working with CASTILLO-ROSARIO to sell counterfeit Adderall pills. CS-2 told law enforcement that CASTILLO-ROSARIO was the creator and operator of the Mrjohnson vendor page. Early in their working relationship, CS-2 helped manufacture pills in a mechanic shop in Massachusetts. CS-2 would also assist in distributing Mrjohnson orders into the mail stream. The mechanic shop was eventually searched by state law enforcement. Inside of the mechanic shop, law enforcement found one motorized pill press, a five-kilogram bag of orange Firmapress powder,¹¹ and 2 scales, among other items. CS-2 was able to independently describe this building accurately and later identified a picture of the location.
- 30. After that, CASTILLO-ROSARIO moved his pill press operation to the basement of the BROOKLYN SALON. CS-2 told law enforcement that the over 16 kilograms of counterfeit pills found in the basement were CASTILLO-ROSARIO's to sell through Mrjohnson, as CASTILLO-ROSARIO liked to keep them in the orange Home Depot buckets seen in paragraph 27.

¹⁰ CS-2 is a cooperating defendant who has previously pled guilty to conspiring to distribute 500 grams or more of methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in the Eastern District of Virginia. CS-2 is cooperating with law enforcement in hopes of a sentencing reduction. Information provided by CS-2 has been proven reliable and, as detailed *infra*, has been significantly corroborated. There is no indication or information available to investigators at this time that CS-2 is providing false information regarding the investigation. Therefore, I deem CS-2's information to be reliable and credible.

¹¹ In my training and experience through this investigation and others, the orange Firmapress powder can be used to make counterfeit pills similar to the ones involved in this investigation.

- 31. CS-2 said that CASTILLO-ROSARIO paid CS-2 in cryptocurrency for CS-2's work on behalf of Mrjohnson. CS-2 told law enforcement that CASTILLO-ROSARIO assisted him in setting up fake profiles through a financial institution that operates a mobile payment application ("PAYMENT SERVICE 1") to withdraw cryptocurrency more easily without detection. CS-2 also told law enforcement that CASTILLO-ROSARIO would route his cryptocurrency back and forth through cryptocurrency wallets in the Dominican Republic.
- 32. CS-2 also informed law enforcement that CASTILLO-ROSARIO had a storage unit at a facility in the Sunset Park neighborhood of Brooklyn, New York. CS-2 said CASTILLO-ROSARIO would store counterfeit Adderall pills there and that CS-2 had brought counterfeit Adderall pills to this storage unit on several occasions.
- 33. Law enforcement was able to corroborate CS-2's information. Most significantly, law enforcement had been conducting independent cryptocurrency analysis on wallets tied to Mrjohnson before speaking to CS-2. When law enforcement conducts investigations involving virtual currency, it sometimes uses commercial services offered by several different blockchain-analysis companies. These companies analyze the Bitcoin blockchain and attempt to identify the individuals or groups involved in transactions. Specifically, these companies have developed proprietary software that analyzes all the data underlying each Bitcoin transaction on the Bitcoin blockchain and then groups related Bitcoin transactions into "clusters" based on that analysis. The methods employed by these blockchain analysis companies have been independently validated by computer scientists, who have shown that these "clustering" techniques provide accurate results. Additionally, through numerous, unrelated investigations, law enforcement has been able to corroborate the accuracy of the information provided via these third-party services.
 - 34. I know, through my training and experience, that the exchange of cryptocurrency is

the primary source of payment used in the trafficking of darknet narcotics. While certain cryptocurrencies, such as Bitcoin, broadcast transactions on a public ledger, those partaking in the cryptocurrency transactions are generally anonymous. The anonymity that cryptocurrency offers creates a platform for illicit activities, such as drug trafficking. Darknet drug vendors are normally paid in cryptocurrency and will typically exchange the cryptocurrency for other items of value, such a gift cards. These types of cryptocurrency transactions typically consist of several steps, which ultimately masks the origin of the funds, leading to a significant amount of money laundering.

- 35. Utilizing these sophisticated investigative techniques, law enforcement identified a cryptocurrency wallet ("MRJOHNSON WALLET") which received payments from other cryptocurrency wallets attributed to Mrjohnson. Notably, law enforcement discovered that the MRJOHNSON WALLET, from at least June 2022 until February 2024, conducted transactions totaling over \$1,000,000 worth of Bitcoin utilizing several other Bitcoin wallets associated with the MRJOHNSON WALLET (the "ASSOCIATE WALLETS"). One of these ASSOCIATE WALLETS would send cryptocurrency to PAYMENT SERVICE 1. The money would then be withdrawn through two accounts: one in CS-2's name and another through a fake profile. The IP addresses for the fake profile account traced back to CS-2's residence. The name of the fake profile was the name CS-2 gave law enforcement. Law enforcement also noticed several of the ASSOCIATE WALLETS sending cryptocurrency to other wallets located in the Dominican Republic.
- 36. Law enforcement was also able to locate the storage unit that CS-2 mentioned CASTILLO-ROSARIO had in Brooklyn, New York. It was located at a Stop & Stor Storage facility. In April 2024, law enforcement served a subpoena upon the Stop & Stor Storage facility

that CS-2 alleged CASTILLO-ROSARIO used to store counterfeit Adderall. In response to the subpoena, Stop & Stor provided subscriber information for the storage unit, which was leased by one of CASTILLO-ROSARIO's family¹² members, but with GREG TELEPHONE NUMBER listed as the contact number.

37. In May 2024, law enforcement secured and executed a search warrant¹³ on the storage unit which found a large black container with a yellow lid. Inside of the container was residue of an orange powdered substance. This container, and the residue substance contained therein, was seemingly identical to those found in the pill press laboratory located in basement of the BROOKLYN SALON, referenced in paragraph 27. The container is shown below:



VI. Estimates of Mrjohnson Sales

38. The Mrjohnson vendor page has been active on DMs since April 2022. Many DMs

 $^{^{12}}$ The storage unit was rented to a female who law enforcement confirmed was the mother of CASTILLO-ROSARIO's partner.

¹³ The search was authorized by the Honorable Marcia M. Henry, United States Magistrate Judge for the Eastern District of New York. *See* 24-MC-1746.

function like lawful E-commerce sites and allow customers to leave reviews for the vendors to inform other potential customers of their experiences. Law enforcement uses these review functions to estimate the number of sales a particular vendor has engaged in.

- 39. The estimates are inherently conservative in nature. For instance, the reviews left by customers, which can be positive or negative, are not mandatory. Also, some markets provide the estimated number of sales a vendor engages in, while other markets do not. Law enforcement will use these numbers if available, but will only apply them to the smallest quantity increment that a vendor lists for sale. The counterfeit Adderall pills sold by Mrjohnson ranged between approximately 0.36 and 0.45 grams per pill, based on law enforcement purchases from Mrjohnson. The estimated weight totals below use the conservative 0.36-gram weight per pill.
- 40. Law enforcement found the Mrjohnson vendor page operating on several DMs. Based on the methods described in part above, law enforcement estimates that the Mrjohnson darknet vendor page has been responsible for at least 5,824 counterfeit Adderall sales, with an estimated distributed weight of at least 66.293 kilograms.

(Continued on next page.)

CONCLUSION

41. Based on the facts set forth above, I respectfully submit that there is probable cause

to believe that, from at least in or around April 2022 and continuing through at least February 2024,

within the Eastern District of Virginia and elsewhere, GREGORY CASTILLO-ROSARIO did

knowingly and intentionally combine, conspire, confederate, and agree with others, known and

unknown, to create a counterfeit substance and distribute 500 grams or more of a mixture and

substance containing a detectable amount of methamphetamine, a Schedule II controlled

substance, in violation of Title 21 U.S.C. §§ 21 U.S.C. §§ 841(a)(1), 841(a)(2), 841(b)(1)(A) and

846..

Respectfully submitted,

Daniel McCoy Daniel McCoy Special Agent

Federal Bureau of Investigation

Attested to in accordance with the requirements of Fed. R. Crim. P. 4. 1 via telephone on October 22, 2024:

Hon. William E. Fitzpatrick

United States Magistrate Judge

Eastern District of Virginia

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